

IN THE UNITED STATES DISTRICT FOR THE
MIDDLE DISTRICT OF PENNSYLVANIA

SHIRLEY A. BANKS-BENNETT
(Plaintiff)

CIVIL ACTION NO.:
1: CV-01-1241

INGRAM MICRO U.S. et al.
(Defendants)

J. Kane

PLAINTIFF BRIEF IN SUPPORT OF MOTION FOR SUMMARY

2. Shirley A. Banks-Bennett is a whistleblower. Bill Munley, Vickie Smith (who is no longer there), Ken Goodman, violating law who were acting under color of an employee's authority. Shirley A. Banks-Bennett, plaintiff, suggests complaining to Commonwealth of Pennsylvania, Pennsylvania Human Relations Commission, docket # E85223 A.D., EEOC Charge No. 17F980434 because plaintiff was a whistleblower. Plaintiff put in an application for employment on or about 04/01/97. On or about July 31, 1997, defendant put a sign out in the front of the building advertising opportunities. Complaint was served on defendant on 08/08/97. Vickie Smith hired three more temporary employees. Five people were hired off the street for the same position that the plaintiff had already been working as a temporary employee. Plaintiff should have been one. Plaintiff was reviewed as a whistleblower. Plaintiff had to show a prima facie retaliation.
3. Plaintiff seeks lost wages, all benefits taxable given to a full-time 2:30 p.m. to 11:00 p.m. employee, pay raises, personal holidays, vacation and bonuses for period of 04/01/97 through 06/14/03. Plaintiff seeks punitive and compensatory damages (tax-free) 1997 – 2003, pecuniary losses, emotional pain and suffering, inconvenience, mental anguish and loss of enjoyment of life and other non-pecuniary losses = \$1,800,000.00 (16,500 employees).

Wherefore, plaintiff is entitled to relief and prays for the defendant to pay.

Respectfully Submitted,



Date: 3-15-04

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